

CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

AUDIT CHECKLIST CONTENTS

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Control Authority (CA) name and address

Date(s) of audit

AUDITOR(S)

Name	Title/Affiliation	Telephone Number

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number
	*	

*Identified program contact

ACRONYM LIST

Acronym	Term
AO	Administrative Order
BMP	Best Management Practices
BMR	Baseline Monitoring Report
CA	Control Authority
CERCLA	Comprehensive Environmental Remediation, Compensation, and Liability Act
CFR	Code of Federal Regulations
CIU	Categorical Industrial User
CSO	Combined Sewer Overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DMR	Discharge Monitoring Report
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
FDF	Fundamentally Different Factors
FTE	Full-Time Equivalent
FWA	Flow-Weighted Average
gpd	gallons per day
IU	Industrial User
IWS	Industrial Waste Survey
MGD	Million Gallons Per Day
MSW	Municipal Solid Waste
N/A	Not Applicable
ND	Not Determined
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
O&G	Oil and Grease
PCI	Pretreatment Compliance Inspection
PCS	Permit Compliance System
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly Owned Treatment Works
QA/QC	Quality Assurance/Quality Control
RCRA	Resource Conservation and Recovery Act
RNC	Reportable Noncompliance
SIU	Significant Industrial User
SNC	Significant Noncompliance
SUO	Sewer Use Ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TOMP	Toxic Organic Management Plan
TRC	Technical Review Criteria
TRE	Technical Review Evaluation
TRIS	Toxics Release Inventory System
TSDF	Treatment, Storage, and Disposal Facility
TTO	Total Toxic Organics
UST	Underground Storage Tank
WENDB	Water Enforcement National Data Base

GENERAL INSTRUCTIONS

1. As noted in the Introduction, the auditor should review a representative number of SIU files. Section I of this checklist provides space to document five IU files. This should not be construed to mean that five is an adequate representation of files to review. The auditor should make as many copies of Section I as needed to document a representative number of files according to the discussion in the Introduction.
2. The auditor should ensure that he/she follows up on any and all violations noted in the previous inspection and annual report during the course of the audit.
3. Throughout the course of the evaluation, the auditor should look for areas in which the CA should improve the effectiveness and quality of its program.
4. Audit findings should clearly distinguish between violations, deficiencies, and effectiveness issues.

INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on all problems identified and any other areas of interest. Where possible, all CIUs (and SIUs) added since the last PCI or audit should be evaluated. Make copies of this section to review additional files as necessary.

IU IDENTIFICATION

FILE ____ Industry name and address

Type of industry

G CIU 40 CFR ____, ____, ____

Average total flow (gpd)

Average process flow (gpd)

Category(ies) _____

G Other SIU

G Non SIU

Industry visited during audit

Yes **G**

No **G**

Comments

FILE ____ Industry name and address

Type of industry

G CIU 40 CFR ____, ____, ____

Average total flow (gpd)

Average process flow (gpd)

Category(ies) _____

G Other SIU

G Non SIU

Industry visited during audit

Yes **G**

No **G**

Comments

IU IDENTIFICATION (Continued)		
FILE ____ Industry name and address	Type of industry	
G CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow (gpd)
G Other SIU G Non SIU	Industry visited during audit Yes G No G	
Comments		

FILE ____ Industry name and address	Type of industry	
G CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow (gpd)
G Other SIU G Non SIU	Industry visited during audit Yes G No G	
Comments		

IU IDENTIFICATION (Continued)		
FILE ____ Industry name and address	Type of industry	
G CIU 40 CFR _____, _____, _____ Category(ies) _____	Average total flow (gpd)	Average process flow (gpd)
	Industry visited during audit Yes G No G	
G Other SIU G Non SIU		
Comments		
General Comments		

Industry Name					<p>INSTRUCTIONS: Evaluate the contents of selected IU files; emphasis should be placed on SIU files. Use N/A (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Comments should be provided in the comment area at the bottom of the page for all violations, deficiencies, and/or other problems as well as for any areas of concern or interest noted. Enter comment number in box and in the comment area at the bottom of the page, followed by the comment. Comments should delineate the extent of the violation, deficiency, and or problem. Attach relevant copies of IU file information for documentation. Where no comment is needed, enter ✓ (check) to indicate area was reviewed. The evaluation should emphasize any areas where improvements in quality and effectiveness can be made.</p>	
File	File	File	File	File		
—	—	—	—	—	<div style="text-align: center;">IU FILE REVIEW</div>	<div style="text-align: center;">Reg. Cite</div>
					A. ISSUANCE OF IU CONTROL MECHANISM	
					1. Control mechanism application form	
					2. Fact sheet	
					3. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
					4. Control mechanism contents	403.8(f)(1)(iii)
					a. Statement of duration (≤ 5 years)	403.8(f)(1)(iii)(A)
					b. Statement of nontransferability w/o prior notification/approval	403.8(f)(1)(iii)(B)
Comments						

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (Continued)	
					c. Applicable effluent limits	403.8(f)(1)(iii)(C)
					• Application of applicable categorical standards	403.8(f)(1)(ii)
					- Classification by category/subcategory	
					- Classification as new/existing source	
					- Application of limits for all categorical pollutants	
					- Application of TTO or TOMP alternative	
					- Calculation and application of production-based standards	403.6(c)
					- Calculation and application of CWF or FWA	403.6(d)&(e)
					- Application of variance to categorical standards	403.7
					• Application of applicable local limits	
					• Application of most stringent limit	403.8(f)(1)(ii)
Comments						

File —	File —	File —	File —	File —	IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (Continued)	
					d. IU self-monitoring requirements	403.8(f)(1)(iii)(D)
					• Sampling (pollutants, frequency, locations, types)	
					• Reporting requirements (e.g., periodic, resampling)	
					• Notification requirements (e.g., slug, spill, changed discharge, 24-hour notice of violation)	
					• Record keeping requirements	403.12(o)
					e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(E)
					f. Compliance schedules/progress reports (if applicable)	403.8(f)(1)(iii)(D)
					g. Slug discharge control plan requirement (if applicable)	403.8(f)(2)(v)
Comments						

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					B. CA COMPLIANCE MONITORING	
					1. Inspection	
					a. Inspection (at least once a year)	403.8(f)(2)(v)
					b. Inspection at frequency specified in approved program	403.8(c)
					c. Documentation of inspection activities	403.8(f)(2)(vi)
					d. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(v)
					2. Sampling	
					a. Sampling (at least once a year)	403.8(f)(2)(v)
					b. Sampling at frequency specified in approved program	403.8(c)
					c. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vi)
					d. Analysis for all regulated parameters	403.12(g)(1)
					e. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vi)
Comments						

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					C. CA ENFORCEMENT ACTIVITIES	
					1. Identification of violations	403.8(f)(2)(vi)
					a. Discharge violations	
					• IU self-monitoring	
					• CA compliance monitoring	
					b. Monitoring/reporting violations	
					• IU self-monitoring	
					- Reporting (e.g., frequency, content)	
					- Sampling (e.g., frequency, pollutants)	
					- Record keeping	
					• Notification (e.g., slug, spill, changed discharge, 24-hour notice of violation)	
					• Slug control plan	
					• Compliance schedule/reports	
					c. Compliance schedule violations	
					• Start-up/final compliance	
					• Interim dates	
Comments						

File	File	File	File	File	IU FILE REVIEW	Reg. Cite
					C. CA ENFORCEMENT ACTIVITIES (Continued)	
					2. Calculation of SNC	403.8(f)(2)(vii)
					a. Chronic	
					b. TRC	
					c. Pass through/interference	
					d. Spill/slug load	
					e. Reporting	
					f. Compliance schedule	
					g. Other violations (specify)	
					3. Response to violation	
					4. Adherence to approved ERP	403.8(f)(5)
					5. Return to compliance	
					a. Within 90 days	
					b. Within time specified	
					c. Through compliance schedule	
					6. Escalation of enforcement	403.8(f)(5)
					7. Publication for SNC	403.8(f)(2)(vii)
					D. OTHER	
Comments						

SECTION I COMPLETED BY:	DATE:
TITLE:	TELEPHONE:

SECTION II: DATA REVIEW/INTERVIEW/IU SITE VISIT

INSTRUCTIONS: Complete this section based on CA activities to implement its pretreatment program. Answers to these questions may be obtained from a combination of sources including discussions with CA personnel, review of general and specific IU files, IU site visits, review of POTW treatment plants, among others. Attach documentation where appropriate. Specific data may be required in some cases.

- Write ND (Not Determined) beside the questions or items that were not evaluated during the audit; indicate the reason(s) why these were not addressed (e.g., lack of time, appropriate CA personnel were not available to answer)
- Use N/A (Not Applicable) where appropriate.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. a. Has the CA made any substantial changes to the pretreatment program that were not reported to the Approval Authority (e.g., legal authority, less stringent local limits, multijurisdictional situation)?

Yes

No

If yes, discuss.

- b. Is the CA in the process of making any substantial modifications to any pretreatment program component (including legal authority, less stringent local limits, DSS requirements, multijurisdictional situation, etc.)?

Yes

No

If yes, describe.

SECTION II: DATA REVIEW/INTERVIEW/IU SITE VISIT (Continued)

B. LEGAL AUTHORITY [403.8(f)(1)]		
<p>1. Are there any contributing jurisdictions discharging wastewater to the POTW?</p> <p>If yes, explain how the legal authority addresses the contributing jurisdictions.</p>	Yes	No
<p>2. a. Has the CA updated its legal authority (e.g., SUO) to reflect changes in the General Pretreatment Regulations?</p> <p>b. Did all contributing jurisdictions update their SUOs in a consistent manner?</p> <p>Explain.</p>	Yes	No
<p>3. Does the CA experience difficulty in implementing its legal authority [i.e., SUO, interjurisdictional agreement (e.g., permit challenged, entry refused, penalty appealed)]?</p> <p>If yes, explain.</p>	Yes	No

SECTION II: DATA REVIEW/INTERVIEW/IU SITE VISIT (Continued)

C. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)]

1. How does the CA define SIU? (Is it the same in contributing jurisdictions?)

2. How are SIUs identified and categorized (including those in contributing jurisdictions)?

Discuss any problems.

3. a. How and when does the CA update its IWS to identify new IUs (including those in contributing jurisdictions)?

b. How and when does the CA identify changes in wastewater discharges at existing IUs (including contributing jurisdictions)?

4. How many IUs are currently identified by the CA in each of the following groups?

a. SIUs (as defined by the CA) [WENDB-SIUS]

CIUs [WENDB-CIUS]

Noncategorical SIUs

b. Other regulated noncategorical IUs (specify)

c. TOTAL

SECTION II: DATA REVIEW/INTERVIEW/IU SITE VISIT (Continued)

D. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]							
1.	a.	How many and what percent of the total SIUs are <u>not</u> covered by an existing, unexpired permit, or other individual control mechanism? [WENDB-NOCM] [RNC-II]	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div> <div style="text-align: right; padding-top: 5px;">%</div>				
	b.	How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism? [RNC-II]	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>				
		If any, explain.					
2.	a.	Do any UST, CERCLA, RCRA corrective action sites and/or other contaminated ground water sites discharge wastewater to the CA?	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>				
	b.	How are control mechanisms (specifically limits) developed for these facilities? Discuss:					
3.	a.	Does the CA accept any waste by truck, rail, or dedicated pipe?	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr style="background-color: #e0e0e0;"> <th style="width: 50%; padding: 2px 5px;">Yes</th> <th style="width: 50%; padding: 2px 5px;">No</th> </tr> <tr> <td style="height: 20px;"></td> <td style="height: 20px;"></td> </tr> </table>	Yes	No		
Yes	No						
	b.	Is any of the waste hazardous as defined by RCRA?	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr style="background-color: #e0e0e0;"> <th style="width: 50%; padding: 2px 5px;">Yes</th> <th style="width: 50%; padding: 2px 5px;">No</th> </tr> <tr> <td style="height: 20px;"></td> <td style="height: 20px;"></td> </tr> </table>	Yes	No		
Yes	No						
		If a. or b. above is yes, explain.					
	c.	Describe the CA's program to control hauled wastes including a designated discharge point (e.g., number of points, control/security, procedures). [403.5(b)(8)]					

SECTION II: DATA REVIEW/INTERVIEW/IU SITE VISIT (Continued)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. What limits (categorical, local, other) does the CA apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.1(b)(1)]

2. How does the CA keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]

3. Local limits evaluation: [403.8(f)(4); 122.21(j)]

a. For what pollutants have local limits been set

b. How were these pollutants decided upon

c. What was the most prevalent/most stringent criteria for the limits

d. Which allocation method(s) were used?

e. Has the CA identified any pollutants of concern beyond those in its local limits?

If yes, how has this been addressed?

Yes	No

SECTION II: DATA REVIEW/INTERVIEW/IU SITE VISIT (Continued)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS (Continued)

4. What problems, if any, were encountered during local limits development and/or implementation?

F. COMPLIANCE MONITORING

1. a. How does the CA determine adequate IU monitoring (sampling, inspecting, and reporting) frequencies?
[403.8(f)(2)(ii)&(v)]

- b. Is the frequency established above more, less, or the same as required?
Explain any difference.

2. In the past 12 months, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)][RNC-II]
(Define the 12 month period _____ to _____.)

- a. Not sampled or not inspected at least once [WENDB-NOIN]
b. Not sampled at least once
c. Not inspected at least once (all parameters)?

	%
	%
	%

If any, explain. Indicate how percentage was determined (e.g. actual, estimated).

/

3. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program performance report. [WENDB] [RNC-II]

SNC Evaluation Period

	%	Applicable pretreatment standards and reporting requirements
	%	Self-monitoring requirements
	%	Pretreatment compliance schedules

*SNC defined by:

POTW	
EPA	

SECTION II: DATA REVIEW/INTERVIEW/IU SITE VISIT (Continued)

F. COMPLIANCE MONITORING (Continued)

4. What does the CA's basic inspection include? (Process areas, pretreatment facilities, chemical and hazardous waste storage areas, chemical spill prevention areas, hazardous waste handling procedures, sampling procedures, laboratory procedures, and monitoring records.) [403.8(f)(2)(v)&(vi)]

5. Who performs CA's compliance monitoring analysis?

- Metals
- Cyanide
- Organics
- Other (specify)

Performed by: CA/Contract Laboratory Name

6. What QA/QC techniques does the CA use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [403.8(f)(2)(vi)]

7. Discuss any problems encountered in identification of sample location, collection, and analysis.

8. Did any IUs notify the CA of a hazardous waste discharge? [403.12(j)&(p)]

If yes, summarize.

Yes	No

SECTION II: DATA REVIEW/INTERVIEW/IU SITE VISIT (Continued)

F. COMPLIANCE MONITORING (Continued)

9. a. How and when does the CA evaluate/reevaluate SIUs for the need for a slug control plan? [403.8(f)(2)(v)]

b. How many SIUs were not evaluated for the need to develop slug discharge control plans in the last 2 years?

--

G. ENFORCEMENT

1. What is the CA's definition of SNC? [403.8(f)(2)(vii)]

2. ERP implementation: [403.8(f)(5)]

a. Status

b. Problems with implementation

c. Is the ERP effective and does it lead to compliance in a timely manner? Provide examples if any are available.

3. a. Does the CA use compliance schedules? [403.8(f)(1)(iv)(A)]

b. If yes, are they appropriate? Provide examples.

Yes	No

SECTION II: DATA REVIEW/INTERVIEW/IU SITE VISIT (Continued)

G. ENFORCEMENT (Continued)			
<p>4. Did the CA publish all SIUs in SNC in the largest daily newspaper in the previous year? [403.8(f)(2)(vii)]</p> <p>If yes, attach a copy.</p> <p>If no, explain.</p>	Yes	No	
<p>5. How many SIUs are in SNC with self-monitoring requirements and were not inspected and/or sampled (in the four most recent full quarters)? [WENDB]</p>			
<p>6. a. Has the CA experienced any problems since the last inspection (interference, pass through, collection system problems, illicit dumping of hauled wastes, or worker health and safety problems) caused by industrial discharges?</p>	Unk	Yes	No
<p>b. If yes, describe and explain the CA's enforcement action against the IUs causing or contributing to problems. [RNC-I]</p>			
H. DATA MANAGEMENT/PUBLIC PARTICIPATION			
<p>1. How is confidential information handled by the CA? [403.14]</p>			
<p>2. How are requests by the public to review files handled?</p>			

SECTION II: DATA REVIEW/INTERVIEW/IU SITE VISIT (Continued)

H. DATA MANAGEMENT/PUBLIC PARTICIPATION (Continued)

3. Describe whether the CA's data management system is effective in supporting pretreatment implementation and enforcement activities.

4. How does the CA ensure public participation during revisions to the SUO and/or local limits? [403.5(c)(3)]

5. Explain any public or community issues impacting the CA's pretreatment program.

6. How long are records maintained? [403.12(o)]

I. RESOURCES [403.8(f)(3)]

1. Estimate the number of personnel (in FTEs) available for implementing the program. [Consider: legal assistance, permitting, IU inspections, sample collection, sample analysis, data analysis, review and response, enforcement, and administration (including record keeping and data management)].

FTEs

SECTION II: DATA REVIEW/INTERVIEW/IU SITE VISIT (Continued)

I. RESOURCES [403.8(f)(3)] (Continued)						
<p>2. Does the CA have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)</p> <p>If no, explain.</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr style="background-color: #e0e0e0;"> <th style="padding: 5px;">Yes</th> <th style="padding: 5px;">No</th> </tr> <tr> <td style="height: 30px;"></td> <td style="height: 30px;"></td> </tr> </table>	Yes	No			
Yes	No					
<p>3. a. Estimate the annual operating budget for the CA's program.</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20px; text-align: center;">\$</td> <td style="height: 20px;"></td> </tr> </table>	\$				
\$						
<p>b. Is funding expected to: stay the same, increase, decrease (note time frame; e.g., following year, next 3 years, etc.)?</p> <p>Discuss any changes in funding.</p>						
<p>4. Discuss any problems in program implementation which appear to be related to inadequate resources.</p>						
<p>5. a. How does the CA ensure personnel are qualified and up-to-date with current program requirements?</p>						
<p>b. Does the CA have adequate reference material to implement its program?</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr style="background-color: #e0e0e0;"> <th style="padding: 5px;">Yes</th> <th style="padding: 5px;">No</th> </tr> <tr> <td style="height: 30px;"></td> <td style="height: 30px;"></td> </tr> </table>	Yes	No			
Yes	No					

SECTION II: DATA REVIEW/INTERVIEW/IU SITE VISIT (Continued)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION

1. a. How many times were the following monitored by the CA during the past year?

- Metals
- Priority pollutants
- Biomonitoring
- TCLP
- EP toxicity
- Other (specify)

Influent	Effluent	Sludge	Ambient (Receiving Water)		
			Less	Equal	More

- b. Is this frequency less than, equal to, or more than that required by the NPDES permit?

Explain any differences.

2. a. Has the CA evaluated historical and current data to determine the effectiveness of pretreatment controls on:

- Improvements in POTW operations
- Loadings to and from the POTW
- NPDES permit compliance
- Sludge quality?

Yes	No

- b. Has the CA documented these findings?

- c. If they have been documented, what form does the documentation take?

Explain. (Attach a copy of the documentation, if appropriate.)

SECTION II: DATA REVIEW/INTERVIEW/IU SITE VISIT (Continued)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (Continued)

3. If the CA has historical data compiled concerning influent, effluent, and sludge sampling for the POTW, what trends have been seen? (Increases in pollutant loadings over the years? Decreases? No change?)

Discuss on pollutant-by-pollutant basis.

4. Has the CA investigated the sources contributing to current pollutant loadings to the POTW (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)?

Yes

No

If yes, what was found?

5. a. Has the CA attempted to implement any kind of public education program?
- b. Are there any plans to initiate such a program to educate users about pollution prevention?
- Explain.

Yes

No

6. What efforts have been taken to incorporate pollution prevention into the CA's pretreatment program (e.g., waste minimization at IUs, household hazardous waste programs)?

SECTION II: DATA REVIEW/INTERVIEW/IU SITE VISIT (Continued)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION (Continued)

7. Does the CA have any documentation concerning successful pollution prevention programs being implemented by IUs (e.g., case studies, sampling data demonstrating pollutant reductions)?

Yes

No

Explain.

K. ADDITIONAL EVALUATIONS/INFORMATION

SECTION II COMPLETED BY:

TITLE:

DATE:

TELEPHONE:

INSTRUCTIONS: Based on information and data evaluated, summarize the findings of the audit for each program element shown below. Identify all problems or deficiencies based on the evaluation of program components. Clearly distinguish between deficiencies, violations, and effectiveness issues. This is to ensure that the final report will clearly identify required actions versus recommended actions and program modifications.

Description	Regulatory Citation	Checklist Question(s)
A. CA PRETREATMENT PROGRAM MODIFICATION		
<ul style="list-style-type: none"> Status of program modifications 	403.18	II.A.1
B. LEGAL AUTHORITY		
<ul style="list-style-type: none"> Minimum legal authority requirements 	403.8(f)(1)	II.B.2&3
<ul style="list-style-type: none"> Adequate multijurisdictional agreements 	403.8(f)(1)	II.B.1&3

Description	Regulatory Citation	Checklist Question(s)
C. IU CHARACTERIZATION		
<ul style="list-style-type: none"> Application of "significant industrial user" definition 	403.3(t)(1)	II.C.1; Attach B.E.2
<ul style="list-style-type: none"> Identify and categorize IUs 	403.8(f)(2)(i)&(ii)	I.A.4.c; II.C.2&3
D. CONTROL MECHANISM		
<ul style="list-style-type: none"> Issuance of individual control mechanisms to all SIUs 	403.8(f)(1)(iii)	II.D.1
<ul style="list-style-type: none"> Adequate control mechanisms 	403.8(f)(1)(iii)	I.A.4
<ul style="list-style-type: none"> Adequate control of trucked, railed, and dedicated pipe wastes 	403.5(b)(8)	II.D.2&3, E.1

Description	Regulatory Citation	Checklist Question(s)
E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS		
<ul style="list-style-type: none"> Appropriately categorize, notify, and apply all applicable pretreatment standards 	403.8(f)(1)(ii)&(iii); 403.5	I.A
<ul style="list-style-type: none"> Basis and adequacy of local limits 	403.8(f)(4); 122.21(j)	II.E.3&4
F. COMPLIANCE MONITORING		
<ul style="list-style-type: none"> Adequate sampling and inspection frequency 	Approved program 403.8(f)(2)(ii)&(v)	I.B.1.a&b, 2.a&b; II.F.1&2
<ul style="list-style-type: none"> Adequate inspections 	403.8(f)(2)(v)&(vi)	I.B.2.c; II.F.3
<ul style="list-style-type: none"> Adequate sampling protocols and analysis 	403.8(f)(2)(vi)	I.B.1.c,d&e; II.F.4,5&6
<ul style="list-style-type: none"> Adequate IU self-monitoring 	403.8(f)(2)(iv)	I.A.4.d, C.1.b; II.F.6, G.5
<ul style="list-style-type: none"> Notification of changed and hazardous waste discharges 	403.12(j)&(p)	I.C.1.b; II.F.7

Description	Regulatory Citation	Checklist Question(s)
F. COMPLIANCE MONITORING (Continued)		
<ul style="list-style-type: none"> Evaluate the need for SIUs to develop slug discharge control plans 	403.8(f)(2)(v)	I.B.2.d; II.F.8
<ul style="list-style-type: none"> Monitor to demonstrate continued compliance and resampling after violation(s) 	403.12(g)(1)&(2); 403.8(f)(2)(vi)	I.A.4.d, C.1.b
G. ENFORCEMENT		
<ul style="list-style-type: none"> Appropriate application of "significant noncompliance" definition 	403.8(f)(2)(vii)	I.C.2; II.G.1; Attach B.I.1
<ul style="list-style-type: none"> Develop and implement an ERP 	403.8(f)(5)	I.C.3; II.G.2
<ul style="list-style-type: none"> Annually publish a list of IUs in SNC 	403.8(f)(2)(vii)	I.C.6; II.G.4
<ul style="list-style-type: none"> Effective enforcement 	403.8(f)(1)(iv)(A)	I.C.1.c, 4&5; II.G.2.c&d, 5&6

Description	Regulatory Citation	Checklist Question(s)
H. DATA MANAGEMENT/PUBLIC PARTICIPATION		
<ul style="list-style-type: none"> Effective data management/public participation 	403.5(c)(3); 403.12(o); 403.14	II.H
I. RESOURCES		
<ul style="list-style-type: none"> Adequate resources 	403.8(f)(3)	II.I

Description	Regulatory Citation	Checklist Question(s)
J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
<ul style="list-style-type: none"> Understanding of pollutants from all sources 		II.J.1&3
<ul style="list-style-type: none"> Documentation of environmental improvements/effectiveness 		II.J.2
<ul style="list-style-type: none"> Integration of pollution prevention 		II.J.6
K. ADDITIONAL EVALUATIONS/INFORMATION		

SECTION III COMPLETED BY: TITLE:	DATE: TELEPHONE:
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ATTACHMENT A

PRETREATMENT PROGRAM STATUS UPDATE

INSTRUCTIONS: This attachment is intended to serve as an update of program status. It should be updated prior to each audit based on information obtained from the most recent PCI and/or audit and the last pretreatment program performance report.

A. CA INFORMATION

1. CA name		
2. a. Pretreatment contact	b. Mailing address	
c. Title	d. Telephone number	
3. Date of last CA report to Approval Authority		
4. Is the CA currently operating under any pretreatment-related consent decree, Administrative Order, compliance schedule, or other enforcement action?	Yes	No
5. Effluent and sludge quality		
a. List the NPDES effluent and sludge limits violated and the suspected cause(s).		
Parameters Violated	Cause(s)	
b. Has the treatment plant sludge violated limits based on the following tests?	Yes	No
• EP toxicity		
• TCLP		

B. PRETREATMENT PROGRAM STATUS

1. Indicate components that were identified as deficient.	Last PCI Date:	Last Audit Date:	Program Report Date:
a. Program modification			
b. Legal authority			
c. Local limits			
d. IU characterization			
e. Control mechanism			
f. Application of pretreatment standards			
g. Compliance monitoring			
h. Enforcement program			
i. Data management			
j. Program resources			
k. Other (specify)			

B. PRETREATMENT PROGRAM STATUS (Continued)

2. Is the CA presently in RNC for any of these violations? a. Failure to enforce against pass through and/or interference [RNC-I][SNC] b. Failure to submit required reports within 30 days [RNC-I][SNC] c. Failure to meet compliance schedule milestones within 90 days [RNC-I][SNC] d. Failure to issue/reissue control mechanisms to 90 percent of SIUs within 6 months [RNC-II] e. Failure to inspect or sample 80 percent of SIUs within the last 12 months [RNC-II] f. Failure to enforce standards and reporting requirements [RNC-III] g. Other (specify) [RNC-III]	Data Source	Yes	No

3. List SIUs in SNC identified in the last pretreatment program performance report, PCI, or audit (whichever is most recent).

Name of SIU in SNC	Reason for SNC	Source (PCI, Annual Report)

4. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements from the CA's last pretreatment program performance report. If the CA's report does not provide this information, obtain the information for the most recent four full quarters during the audit.

SNC evaluation period

	%	Applicable pretreatment standards and reporting requirements Self-monitoring requirements Pretreatment compliance schedules	*SNC defined by:	
	%		POTW	
	%		EPA	

5. Describe any problems the CA has experienced in implementing or enforcing its pretreatment program.

ATTACHMENT A COMPLETED BY:

TITLE:

DATE:

TELEPHONE:

ATTACHMENT B
PRETREATMENT PROGRAM PROFILE

INSTRUCTIONS: This attachment is intended to serve as a summary of program information. This background information should be obtained from the original, approved pretreatment program submission and modifications and the NPDES permit. The profile should be updated, as appropriate, in response to approved modifications and revised NPDES permit requirements.

A. CA INFORMATION

1. CA name
2. Original pretreatment program submission approval date
3. Required frequency of reporting to Approval Authority
4. Specify the following CA information.

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date

5. Does the CA hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements?

Yes	No

If yes, provide the following information.

POTW Name	Issuing Authority	Issuance Date	Expiration Date	Regulated Pollutants

B. PRETREATMENT PROGRAM MODIFICATIONS

1. When was the CA's NPDES permit first modified to require pretreatment implementation? [WENDB-PTIM]
2. Identify any substantial modifications the CA made in its pretreatment program since the approved pretreatment program submission. [403.18]

Date Approved	Name of Modification	Date Incorporated in NPDES Permit

C. TREATMENT PLANT INFORMATION

INSTRUCTIONS: Complete this section for each treatment plant operated under an NPDES permit issued to the CA.

1. Treatment plant name

2. Location address

3. a. NPDES permit number

b. Expiration date

4. Treatment plant wastewater flows

Design

MGD

Actual

MGD

5. Sewer System

a. Separate %

b. Combined %

c. Number of CSOs

6. a. Industrial contribution (MGD)

b. Number of SIUs discharging to plant

c. Percent industrial flow to plant

7. Level of treatment

Type of Process(es)

a. Primary

b. Secondary

c. Tertiary

8. Indicate required monitoring frequencies for pollutants identified in NPDES permit.

**Influent
(Times/Year)****Effluent
(Times/Year)****Sludge
(Times/Year)****Receiving Stream
(Times/Year)**

a. Metals

b. Organics

c. Toxicity testing

d. EP toxicity

e. TCLP

9. Effluent Discharge

a. Receiving water name

b. Receiving water classification

c. Receiving water use

d. If effluent is discharged to any location other than the receiving water, indicate where.

10. 301(h) waiver (ocean discharge)

Yes**No**

a. Applied for

c. Date of application

b. Granted

d. Date approved or denied

C. TREATMENT PLANT INFORMATION (Continued)

	N/A	Yes	No
11. Did the CA submit results of whole effluent biological toxicity testing as part of its NPDES permit application(s)? [122.21(j)(1) and (2)]			
a. If yes, did the CA use EPA-approved methods? [122.21(j)(3)]			
b. Has there been a pattern of toxicity demonstrated?			

12. Indicate methods of sludge disposal.

	Quantity of sludge			Quantity of sludge	
a. Land application	<input type="text"/>	dry tons/year	e. Public distribution	<input type="text"/>	dry tons/year
b. Incineration	<input type="text"/>	dry tons/year	f. Lagoon storage	<input type="text"/>	dry tons/year
c. Monofill	<input type="text"/>	dry tons/year	g. Other (specify)	<input type="text"/>	dry tons/year
d. MSW landfill	<input type="text"/>	dry tons/year			

D. LEGAL AUTHORITY

1. a. Indicate where the authority to implement and enforce pretreatment standards and requirements is contained (cite legal authority).

b. Date enacted/adopted

c. Date of most recent revisions

2. Does the CA's legal authority enable it to do the following? [403.8(f)(1)(i-vii)]

- | | Yes | No |
|--|----------------------|----------------------|
| a. Deny or condition pollutant dischargers [403.8(f)(1)(i)] | <input type="text"/> | <input type="text"/> |
| b. Require compliance with standards [403.8(f)(1)(ii)] | <input type="text"/> | <input type="text"/> |
| c. Control discharges through permit or similar means [403.8(f)(1)(iii)] | <input type="text"/> | <input type="text"/> |
| d. Require compliance schedules and IU reports [403.8(f)(1)(iv)] | <input type="text"/> | <input type="text"/> |
| e. Carry out inspection and monitoring activities [403.8(f)(1)(v)] | <input type="text"/> | <input type="text"/> |
| f. Obtain remedies for noncompliance [403.8(f)(1)(vi)] | <input type="text"/> | <input type="text"/> |
| g. Comply with confidentiality requirements [403.8(f)(1)(vii)] | <input type="text"/> | <input type="text"/> |

3. a. How many contributing jurisdictions are there?

List the names of all contributing jurisdictions and the number of SIUs in those jurisdictions.

Jurisdiction Name	Number of CIUs	Number of Other SIUs
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>

D. LEGAL AUTHORITY (Continued)

3. b. Has the CA negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?	Yes	No
--	-----	----

If yes, describe the legal agreements (e.g., intergovernmental contract, agreement, IU contracts, etc.).		
4. If relying on contributing jurisdictions, indicate which activities those jurisdictions perform.		
a. IWS update b. Permit issuance c. Inspection and sampling d. Enforcement	<input style="width: 100px; height: 20px;" type="text"/> <input style="width: 100px; height: 20px;" type="text"/> <input style="width: 100px; height: 20px;" type="text"/> <input style="width: 100px; height: 20px;" type="text"/>	e. Notification of IUs f. Receipt and review of IU reports g. Analysis of samples h. Other (specify)
E. IU CHARACTERIZATION		
1. a. Does the CA have procedures to update its IWS to identify new IUs or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] b. Indicate which methods are to be used to update the IWS. <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%;"> <ul style="list-style-type: none"> Review of newspaper/phone book Review of water billing records Review of plumbing/building permits </div> <div style="width: 45%;"> <ul style="list-style-type: none"> Onsite inspections Permit application requirements Citizens involvement Other (specify) </div> </div> c. How often is the IWS to be updated?	<input style="width: 100px; height: 20px;" type="text"/> <input style="width: 100px; height: 20px;" type="text"/> <input style="width: 100px; height: 20px;" type="text"/> <input style="width: 100px; height: 20px;" type="text"/> <input style="width: 100px; height: 20px;" type="text"/>	<div style="background-color: #e0e0e0; padding: 2px 5px;">Yes</div> <div style="background-color: #e0e0e0; padding: 2px 5px;">No</div> <input style="width: 100px; height: 20px;" type="text"/> <input style="width: 100px; height: 20px;" type="text"/> <input style="width: 100px; height: 20px;" type="text"/> <input style="width: 100px; height: 20px;" type="text"/>
2. Is the CA's definition of "significant industrial user" consistent within the language in the Federal regulations? [403.3(i)(1)] If no, provide the CA's definition of "significant industrial user."	<div style="background-color: #e0e0e0; padding: 2px 5px;">Yes</div> <div style="background-color: #e0e0e0; padding: 2px 5px;">No</div> <input style="width: 100px; height: 20px;" type="text"/> <input style="width: 100px; height: 20px;" type="text"/>	<div style="background-color: #e0e0e0; padding: 2px 5px;">Yes</div> <div style="background-color: #e0e0e0; padding: 2px 5px;">No</div> <input style="width: 100px; height: 20px;" type="text"/> <input style="width: 100px; height: 20px;" type="text"/>

F. CONTROL MECHANISM			
1. a. Identify the CA's approved control mechanism (e.g., permit, etc.).			
b. What is the maximum term of the control mechanism?			
2. Does the approved control mechanism include the following? [403.8(f)(1)(iii)]		Yes	No
a. Statement of duration			
b. Statement of nontransferability			
c. Effluent limits			
d. Self-monitoring requirements			
• Identification of pollutants to be monitored			
• Sampling location			
• Sample type			
• Sampling frequency			
• Reporting requirements			
• Notification requirements			
• Record keeping requirements			
e. Statement of applicable civil and criminal penalties			
f. Applicable compliance schedule			
3. Does the CA have a control mechanism for regulating IU whose wastes are trucked to the treatment plant?		N/A	Yes No
4. Does the program identify designated discharge point(s) for trucked or hauled wastes? [403.5(b)(8)]			
If yes, described the discharge point(s) (including security procedures).			
G. APPLICATION OF STANDARDS			
1. Does the CA have procedures to notify all IUs of applicable pretreatment standards and any applicable requirements under the CWA and RCRA? [403.8(f)(2)(iii)]		Yes	No
2. If there is more than one treatment plant, were local limits established specifically for each plant?		N/A	Yes No

G. APPLICATION OF STANDARDS (Continued)

3. Has the CA technically evaluated the need for local limits for all pollutants listed below? [WENDB-EVLL] [403.5(c)(1); 403.8(f)(4)]

Partial Technical Evaluation (not all 10 pollutants evaluated)?

	Headworks Analysis Completed?		Technically Evaluated?		Local Limits Adopted?		Local Limit (Numeric)
	Yes	No	Yes	No	Yes	No	
a. Arsenic (As)							
b. Cadmium (Cd)							
c. Chromium (Cr)							
d. Copper (Cu)							
e. Cyanide (CN)							
f. Lead (Pb)							
g. Mercury (Hg)							
h. Nickel (Ni)							
i. Silver (Ag)							
j. Zinc (Zn)							
k. (Other (specify)							

H. COMPLIANCE MONITORING

1. Indicate compliance monitoring and inspection frequency requirements.

Program Aspect	Approved Program Requirement	NPDES Permit Requirement	State Requirement	Minimum Federal Requirement
a. Inspections				
• CIUs				1/year
• Other SIUs				1/year
b. Sampling by POTW				
• CIUs				1/year
• Other SIUs				1/year
c. Self-monitoring				
• CIUs				2/year
• Other SIUs				2/year
d. Reporting by IU				
• CIUs				2/year
• Other SIUs				2/year

I. ENFORCEMENT

	Yes	No
1. Does the CA's program define "significant noncompliance"?		
If yes, is the CA's definition of "significant noncompliance" consistent with EPA's? [403.8(f)(2)(vii)]		
If no, provide the CA's definition of "significant noncompliance."		

	Yes	No	
2. Does the CA have an approved, written ERP? [403.8(f)(5)]			
3. Indicate the compliance/enforcement options that are available to the POTW in the event of IU noncompliance. [403.8(f)(1)(vi)]			
a. Notice or letter of violation		f. Administrative Order	
b. Compliance schedule		g. Revocation of permit	
c. Injunctive relief		h. Fines (maximum amount)	
d. Imprisonment		• Civil	\$_____/day/violation
e. Termination of service		• Criminal	\$_____/day/violation
		• Administrative	\$_____/day/violation

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

	Yes	No
1. Does the approved program describe how the POTW will manage its files and data?		
Are files/records <input type="checkbox"/> computerized? <input type="checkbox"/> hard copy? <input type="checkbox"/> both?		
	Yes	No
2. Are program records available to the public?		
3. Does the POTW have provisions to address claims of confidentiality? [403.8(f)(2)(vii)]		

K. RESOURCES

1. What are the resource allocations for the following pretreatment program components:

- a. Legal assistance
- b. Permitting
- c. Inspections
- d. Sample collection
- e. Sample analysis
- f. Data analysis, review, and response
- g. Enforcement
- h. Administration?
- TOTAL

FTEs

2. Identify the sources of funding for the pretreatment program. [403.8(f)(3)]

- a. POTW general operating fund
- b. IU permit fees
- c. Industry surcharges

- d. Monitoring charges
- e. Other (specify)

L. ADDITIONAL INFORMATION

ATTACHMENT B COMPLETED BY:

TITLE:

DATE:

TELEPHONE:

ATTACHMENT C

WORKSHEETS

- **IU SITE VISIT DATA SHEET**
- **WENDB DATA ENTRY WORKSHEET**
- **RNC WORKSHEET**

IU SITE VISIT DATA SHEET

I. IU SITE VISIT REPORT FORM	
INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.	
Name and address of industry	
Date of visit	Time of visit
Name(s) of inspector(s)	
Provide name(s) and title(s) of industry representative(s).	
Name	Title
Classification assigned by CA:	
Provide the following documentation: <ol style="list-style-type: none"> 1. Describe the products manufactured or the services provided by the IU. 2. Verify CA's classification or discuss any errors. 3. Describe any significant changes in processes or flow. 4. Identify the raw materials and processes used. (Include discussion of where wastewater is produced and discharged and attach a step-by-step diagram if possible.) 5. Describe the sample location and any differences in CA and IU locations. 6. Describe the treatment system which is in place. 7. Identify the chemicals that are maintained onsite and how they are stored. (Attach list of chemicals, if available.) Discuss the adequacy of spill prevention. 8. Discuss whether hazardous wastes are stored or discharged and any related problems. 	
Notes:	

IU SITE VISIT DATA SHEET (Continued)

IU Name	Date
<p>Notes:</p>	

<p align="center">IU SITE VISIT REPORT FORM COMPLETED BY: TITLE:</p>	<p align="center">DATE: TELEPHONE:</p>
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WENDB DATA ENTRY WORKSHEET

II. WENDB DATA ENTRY WORKSHEET			
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.			
CA name			
NPDES number			
Date of audit			
	PCS Code	Checklist Reference	Data
• Number of SIUs*	SIUS	II.C.4.a	
• Number of CIUs	CIUS	II.C.4.a	
- Number of SIUs without control mechanism	NOCM	II.D.1.a	
- Number of SIUs not inspected or sampled	NOIN	II.F.2.a	
- Number of SIUs in SNC** with standards or reporting	PSNC	Attach A.B.4	
- Number of SIUs in SNC with self-monitoring	MSNC	Attach A.B.4	
- Number of SIUs in SNC with self-monitoring and not inspected or sampled	SNIN	II.G.5	
*The number of SIUs entered into PCS is based on the CA's definition of "significant industrial user."			
**As defined in 40 CFR 403.8(f)(2)(vii).			

WENDB DATA ENTRY WORKSHEET COMPLETED BY: TITLE:	DATE: TELEPHONE:
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RNC WORKSHEET

III. RNC WORKSHEET		
INSTRUCTIONS: Place a check in the appropriate box on the left if the CA is found to be in RNC or SNC.		
CA name		
NPDES number		
Date of audit		
		Level
		Checklist Reference
<input type="checkbox"/>	Failure to enforce against pass through and/or interference	I
<input type="checkbox"/>	Failure to submit required POTW reports within 30 days	I
<input type="checkbox"/>	Failure to meet compliance schedule milestone date within 90 days	I
<input type="checkbox"/>	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II
<input type="checkbox"/>	Failure to inspect or sample 80% of SIUs within the last 12 months	II
<input type="checkbox"/>	Failure to enforce pretreatment standards and reporting requirements (more than 15% of SIUs in SNC)	II
<input type="checkbox"/>	Other (specify)	II
SNC		
<input type="checkbox"/>	CA in SNC for violation of any Level I criterion	
<input type="checkbox"/>	CA in SNC for violation of two or more Level II criterion	
For more information on RNC, please refer to EPA's 1990 <u>Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements</u> .		

RNC WORKSHEET COMPLETED BY:	DATE:
TITLE:	TELEPHONE: